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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

| | | |
|----------------------------|---|--|
| KIRSTIN BLAISE LOBATO, |) | |
| |) | Case No. 2:19-cv-01273-RFB-EJY |
| Plaintiff, |) | |
| v. |) | Judge Richard F. Boulware, II |
| |) | |
| LAS VEGAS METROPOLITAN |) | Magistrate Judge Elayna J. Youchah |
| POLICE DEPARTMENT, NEVADA, |) | |
| THOMAS THOWSEN, and JAMES |) | STIPULATION AND PROPOSED |
| LAROCHELLE, |) | ORDER EXTENDING DEADLINE |
| |) | TO FILE ESI PROTOCOL |
| Defendants. |) | |

(First Request)

Plaintiff Kirstin Blaise Lobato, by and through counsel of record, and
Defendants Las Vegas Metropolitan Police Department, Thomas Thowsen, and
James LaRochelle, through their counsel of record, hereby stipulate and agree that
the time for the parties to file their ESI protocol should be extended by one week—
from October 18, 2019, until and including October 25, 2019.

1 The instant filing is the first request for an extension of time for the parties
2 to file their ESI protocol. The parties filed their Rule 26(f) Report on September 12,
3 2019. ECF 23. The deadline in this report for the parties to file their ESI protocol
4 was October 18, 2019. An additional one-week extension is necessary because both
5 parties have been occupied with initial disclosures and briefing Defendants' Motion
6 to Dismiss (ECF 25). This extension will not delay the progress of this case because
7 the parties continue to move forward diligently with discovery.

8 Plaintiff's counsel has conferred with counsel for Defendants, and the parties
9 have agreed to this extension. Accordingly, Plaintiff and Defendants stipulate that
10 the parties' deadline to file their ESI protocol should be extended to October 25,
11 2019. This stipulation is made in good faith and not for the purpose of delay.

12
13 RESPECTFULLY SUBMITTED,

14
15 /s/ Megan Pierce
16 One of Plaintiff's Attorneys

17 /s/ Craig Anderson
18 One of Defendants' Attorneys

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ORDER

IT IS SO ORDERED that the above
Stipulation is hereby GRANTED. The parties
shall have until October 25, 2019, to file their
ESI protocol.


UNITED STATES MAGISTRATE JUDGE

Dated: October 21, 2019